

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

INA STEINER, DAVID STEINER, and
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., et al.

Defendants.

Case No. 1:21-CV-11181-PBS

**ASSENTED TO MOTION FOR LIMITED MODIFICATION OF PROTECTIVE
ORDER TO ALLOW COUNSEL TO INSPECT AND COPY “WHATSAPP” MESSAGES
RESPONSIVE TO DEFENDANT STEVE WYMER’S DOCUMENT REQUEST**

With assent of both affected parties—the U.S. Attorney’s Office (“USAO”) and David Harville—Defendant Steve Wymer respectfully requests that the Court enter a limited modification of the protective order entered in *United States v. Baugh, et al.*, No. 1:20-CR-10263-PBS (“Criminal Case”)¹ allowing Harville to permit Wymer’s undersigned counsel in this action to extract any WhatsApp messages that the USAO provided to Harville pursuant to Rule 16 of the Federal Rules of Criminal Procedure, which are responsive to Wymer’s document requests in this case. Despite diligent efforts, Wymer has been unable to obtain this discovery from any other source and believes it to be unavailable absent the requested relief.² In support of this Motion, Wymer states as follows:

¹ See Criminal Case, Document No. 44 (the “Protective Order”).

² Plaintiffs and all defendants in this civil case except Stephanie Popp, Stephanie Stockwell, and Veronica Zea have advised the undersigned counsel for Wymer that they either assent to this Motion or do not oppose it. Defendants Popp, Stockwell, and Zea did not respond to the undersigned counsels’ request for their position.

9/2/24
w/assent
Pope & Associates